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VIA ECF

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Renwick Haddow*, 1:19-cr-00340

Dear Judge Swain:

We respectfully submit this letter on behalf of our client Renwick Haddow to request that he be released on bail from the Queens Detention Facility pending his sentencing. It has become increasingly perilous for him to remain at that facility due to the increasing number of inmates and staff who have become infected with the coronavirus. Mr. Haddow, a citizen of the United Kingdom, is a nonviolent offender who entered into a cooperation agreement with the government. He has already testified in two trials and continues to cooperate in further investigations. His sentencing is currently scheduled for July 10, 2020. Assistant United States Attorney Martin Bell, one of the prosecutors in charge of this case, has consented on behalf of government to Mr. Haddow's release on the conditions described below.

If released on bail, Mr. Haddow will reside at a New York City apartment¹ and will wear an electronic ankle bracelet monitored by Pretrial Services. His continued detention will be supervised by Pretrial Services, and he will be permitted to leave the apartment for food and supplies, medical treatment, and meetings with his attorneys and prosecutors only as previously authorized by Pretrial Services.

Mr. Haddow will sign a \$400,000 bond to secure his release. His parents have agreed to co-sign the \$400,000 bond and secure it with liens on their two homes, which are located in England and Australia. The government has agreed that the parents, who live abroad, may have

¹ For privacy purposes, the address is not disclosed here but has been given to AUSA Bell and will be given to Pretrial Services.

up to 30 days to sign the bond and complete the necessary formalities under local law. Mr. Haddow, however, may be released from custody immediately after he executes the bond and is fitted with the ankle bracelet and moved to the apartment.

We respectfully ask that the Court approve this application, again with the consent of the government. If the Court has any questions of counsel, Mr. Bell and I will make ourselves available for a telephone conference.

The Court's consideration is sincerely appreciated.

Respectfully submitted,

/s/ Edward J.M. Little
Edward J.M. Little

cc: Martin Bell, Esq.